CDM Smith Comments on Modification 10 and Asbestos Sampling SOP

Data Quality Objectives – Where are the data quality objectives associated with the asbestos sampling? The modification simply states that Roux Associates will evaluate the potential presence of asbestos in surface soil in the four asbestos landfills. Is the goal to provide data for the purposes of evaluating the nature and extent of contamination and/or risk assessment? If asbestos is present, what threshold will be used to compare the data to? Note, EPA's asbestos framework (https://semspub.epa.gov/work/HQ/175329.pdf) is clear that simply using a threshold of 1% is not protective of human health. Because of this, the framework recommends that activity-based sampling (ABS) be conducted to evaluate human health risk.

Sample Collection – How will building materials that may contain asbestos be collected if encountered during sampling? Will a separate sample be collected and sent to the laboratory for analysis? How will soil subsamples be collected in areas where vegetation is present? How will vegetation be treated? Will it be removed and the soil beneath it sampled? How will subsamples be collected if the concrete pad in the southwest landfill is identified by random sampling? Why is homogenization/sample size reduction being performed in the field? Can homogenization/sample size reduction be performed at the laboratory?

Field Quality Control - It does not appear that field quality control samples are slated to be collected. Field duplicate samples should be collected as samples co-located in the same area as the parent sample. The duplicate will be collected using the same number of subsamples as the parent sample, but from different randomly-selected subsample locations.

Custody Seals – Self-adhesive seals should be applied to an individual sample or sample container to demonstrate that sample integrity has not been compromised during sample transfer.

Laboratory Sample Preparation – How will samples be prepared at the laboratory? Where is this information specified? There are numerous preparation methods that a laboratory could employ, some of which may not be ideal for the type(s) of asbestos that may be present at the Site.

Laboratory Analysis – Why has CARB 435 not been selected as the analysis method as recommended in EPA's asbestos framework? If using EPA 600, has it been confirmed with the laboratory that soil reference materials are available for use in this method? Where will instructions to the laboratory regarding analysis to be provided? Does the laboratory have latitude to perform only a point count analysis or are they being instructed to perform both a visual area estimation (assuming reference materials are available) and a point count? If point counting is to be performed, has the laboratory been provided with the quantity of points to be counted (e.g., 400, 1,000, etc.)?

CDM Smith Comments on Modification 11 and Pneumatic Slug Testing SOP

Description of Modification; SOP Sections 2.0 and 4.2 – Wells in which the screen is not fully submerged should be tested using mechanical slug testing methodology.

Please prepare additional SOPs outlining mechanical slug testing and slug test data analysis methodologies.

Note that additional comments have been added in 'track changes' redline-strikeout within the text of the SOP.